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November 22, 2017

Via ECF

Honorable Katharine S. Hayden
Senior United States District Judge
United States District Court for the District of New Jersey
United States Courthouse
Room PO 05
50 Walnut Street
Newark, New Jersey 07101-0999

**Re: *In re Allergan Generic Drug Pricing Securities Litigation*,
Civil Action No.: 2:16-cv-09449 (KSH)(CLW)**

Dear Judge Hayden:

We, along with Co-Lead Counsel, represent Lead Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG and the class (collectively, "Plaintiffs") in the above-referenced matter.

Plaintiffs have filed an Unopposed Motion to Supplement and Amend the Consolidated Amended Class Action Complaint (the "Motion") pursuant to Federal Rules of Civil Procedure 15(a) and 15(d). Plaintiffs' proposed Second Amended Consolidated Complaint ("Second Amended Complaint") is filed as Exhibit A to the Motion.

The newly discovered evidence is found in a proposed amended complaint filed on October 31, 2017 by forty-six state Attorneys General in their pending action against several generic drug manufacturers (the "Amended AG Complaint"). The Amended AG Complaint includes, for the first time, claims against Allergan and details emails, phone calls, texts and meetings between Allergan executives and co-conspiring representatives of other drug companies that provide direct evidence of the price-fixing scheme described in the Complaint. The Second Amended Complaint also contains a new allegedly false and misleading statement made by Defendant Brenton Saunders.

Counsel for Plaintiffs have conferred with counsel for Defendants, and they do not oppose Plaintiffs' Motion. The parties will promptly submit to the Court a proposed stipulation setting forth a briefing schedule on Defendants' motion to dismiss the Second Amended Complaint.

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Thank you for your kind courtesies. Of course, should the Court have any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI
OLSTEN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All Counsel of Record (via ECF)

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